Nuclear Operating Company

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

July 7, 2011
NOC-AE-11002696
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 1 and 2
Docket No. STN 50-498, STN 50-499
60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies

Reference: Letter dated June 8, 2011 from C. T. Bowman, STP Nuclear Operating Company to NRC Document Control Desk, "30-Day Response to NRC Bulletin 2011-01, "Mitigating Strategies," (NOC-AE-11002675) (ML11165A095)

The Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011, to request each licensee to provide a comprehensive verification of their compliance with the regulatory requirements of 10 CFR 50.54(hh)(2).

In NRC Bulletin 2011-01, the NRC requested each licensee to submit a written response within 30 days of the date of the Bulletin, which was provided in the above referenced letter.

Pursuant to 10 CFR 50.54(f), the attachment to this letter provides the STP Nuclear Operating Company's (STPNOC) response requested within 60 days of the date of the Bulletin to provide information regarding mitigation strategies programs for 10 CFR 50.54(hh)(2).

The attachment includes information that addresses measures that are currently in place as well as an additional planned action with expected completion date. The additional planned action is considered a voluntary enhancement. There are no commitments in this letter.

If you have questions regarding this letter please contact either Robyn Savage (Licensing contact) at 361-972-7438 or me at 361-972-7454.

A146
NRR

STI: 32897604

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2011

Charles T. Bowman
General Manager
Nuclear Safety Assurance

rds

Attachment: STPNOC 60-Day Response to Bulletin 2011-01

cc:
(paper copy)

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
612 East Lamar Blvd, Suite 400
Arlington, Texas 76011-4125

Balwant K. Singal
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (MS 8B1)
11555 Rockville Pike
Rockville, MD 20852

Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

Balwant K. Singal
U. S. Nuclear Regulatory Commission

John Ragan
Catherine Callaway
Jim von Suskil
NRG South Texas LP

Ed Alarcon
Kevin Pollo
Richard Pena
City Public Service

Peter Nemeth
Crain Caton & James, P.C.

C. Mele
City of Austin

Richard A. Ratliff
Texas Department of State Health Services

Alice Rogers
Texas Department of State Health Services

STPNOC 60-Day Response to Bulletin 2011-01

On May 11, 2011, the NRC issued Bulletin 2011-01 'Mitigating Strategies'. Below is STP Nuclear Operating Company's (STPNOC) response to the 60 day information request.

Many of the items described below represent current station practices. Individual items may be revised or adjusted in the future based on new or revised vendor recommendations, industry experience, etc., in accordance with established processes. Any changes involving commitments will be executed in accordance with NEI 99-04 Revision 0 "Commitment Management Guidelines".

NRC Request:

Within 60 days of the date of this bulletin, the NRC requests that licensees provide information regarding their mitigation strategies programs for 10 CFR 50.54(hh)(2).

In responding to the following questions, provide information that addresses measures that are currently in place, noting any additional planned actions with expected completion dates.

NRC Request 1:

Describe in detail the maintenance of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed.

Examples of the types of information to include when providing your response to Question (1) are:

a. *Measures implemented to maintain the equipment, including periodicity.*

b. *Basis for establishing each maintenance item (e.g., manufacturer's recommendation, code or standard applicable to the craft). This should include consideration of storage environment impact on the maintenance necessary.*

These examples are not meant to limit your response if you use other methods to address the issues described above.

STPNOC Response (1)

Currently STPNOC performs preventive maintenance as described in the table below to support the mitigating strategies required by 10 CFR 50.54(hh)(2) ensuring the equipment is functional when needed.

Equipment, such as fire hoses, the B.5.b Diesel Driven Portable Pump, and other components are stored in a dry environment to ensure full availability when needed.

The maintenance activities listed below have been established to ensure that the procured B.5.b equipment can perform its intended function.

STPNOC 60-Day Response to Bulletin 2011-01

Equipment	Preventive Maintenance	Periodicity	Basis
B.5.b Diesel Driven Portable Pump	Verify pump hours. If indicated hours are greater than 250 hours of operation then lubricate pump bearing.	Every 4 weeks	Manufacturer recommended maintenance
B.5.b Diesel Driven Portable Pump	Battery Float Charge	Continuous -unless B.5.b Diesel Driven Portable Pump in use	Manufacturer Recommendation for starting reliability – maintain max capacity
B.5.b Diesel Driven Portable Pump	1) Lubricate pump bearing every 250 hours of operation, if required 2) service fire extinguisher 3) service battery 4) change engine oil and replace oil filter 5) check coolant pump weep hole foam filter	Semi-annual	Manufacturer recommended maintenance
B.5.b Diesel Driven Portable Pump	1) Lubricate pump bearing every 250 hours of operation, if required 2) change engine oil and replace oil filter 3) check coolant pump weep hole foam filter 4) clean crankcase vent tube 5) check air intake hoses, connections and systems 6) replace fuel filter	Annual inspection	Manufacturer recommended maintenance

STPNOC 60-Day Response to Bulletin 2011-01

Equipment	Preventive Maintenance	Periodicity	Basis
	element(s) 7) check belt tensioner and belt wear 8) check cooling system 9) coolant solution analysis – add supplemental coolant additives, as needed 10) pressure test cooling system 11) check engine speeds 12) check crankcase vibration damper 13) check engine ground connection 14) service fire extinguisher 15) service battery		
B.5.b Contingency fire hoses	Replace all of the contingency fire hoses.	Every 3 years	Station has elected to replace B.5.b fire hoses rather than hydrostatically test every three years
Pressure and Differential Pressure gauges	Standard instrument calibration	Every 3 years	Industry Standard calibration frequency. Frequency is the same as pressure gauges used for Inservice Testing of Auxiliary Feedwater pumps, which is the system the gauges are used in.
Electronic flow gauges	Battery check	Quarterly	Normal inventory frequency of emergency equipment.
Spent Fuel Pool Spray Monitors	Lubricate	Every 3 years	Manufacturer recommended maintenance

STPNOC 60-Day Response to Bulletin 2011-01

NRC Request 2

Describe in detail the testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it will function when needed.

Examples of the types of information to include when providing your response to Question (2) are:

a. *A description of any testing accomplished to ensure the strategies were initially feasible.*

b. *A description of any periodic testing instituted for the equipment, along with the basis for establishing that test requirement.*

c. *A description of the corrective action process used when the equipment fails to adequately perform its test.*

These examples are not meant to limit your response if you use other methods to address the issues described above.

STPNOC Response (2)

All strategies developed at South Texas Project (STP) are contained within an approved procedure or guideline. Per the Westinghouse Owners Group – Emergency Response Guidelines, as well as specific procedure processes, new strategies or changes to existing strategies contained within procedures are required to be validated. Subsequently, when new procedures or strategies contained within existing procedures are developed (that may contain Operator Time Critical Actions) the procedures are validated on the actual plant, if possible. However, if it is not possible to actually perform a validation of a procedure due to regulatory or plant condition without an increase in risk, then a simulation, walk down, or mock up is performed using the procedure, prior to procedure approval.

In addition, training is provided to operating crews, during which, any further deficiencies may be noted and corrected.

The 10 CFR 50 Appendix B Corrective Action Program (CAP) is used to document failures, establish priorities for corrective actions and perform trending.

Any maintenance needed will follow the normal work flow process as described in normal station work flow guidelines and processes. As of the date of this response, there are no outstanding deficiencies that would render the strategies not viable.

STPNOC 60-Day Response to Bulletin 2011-01

The following table is a description of testing accomplished to ensure the strategies' initial feasibility.

Strategy	Description
Spent Fuel Pool External Makeup and External Spray	Time validation
Spent Fuel Pool Spray	Spray pattern validation

The following table describes periodic testing instituted for the equipment, along with the basis for establishing that test requirement.

Equipment	Test Description	Periodicity	Basis
B.5.b Diesel Driven Portable Pump	Unloaded run	Every 4 weeks	Manufacturer recommended maintenance
B.5.b Diesel Driven Portable Pump	Flow Verification	See Note[1]	Judgment based on operational considerations
B.5.b Contingency fire hoses	Replace all of the B.5.b contingency fire hoses	Every 3 years	Station procedures hydrostatically test fire hoses every 3 years. Station has elected to replace B.5.b Contingency fire hoses rather than hydrostatically test them.

Note:

[1] The pump was initially flow-tested upon receipt and recently in April 2011. The pump was previously run at least annually during outages to pump out the circulating water piping. A decision was made to discontinue the use of the pump for this purpose in the future. CR 11-6657 was written to develop a preventive maintenance activity to perform a periodic pump flow test or vendor recertification of the pump on an 18 month frequency.

Planned Action/Expected Completion Date

Action: STPNOC plans to develop a preventive maintenance (PM) activity to perform periodic pump flow testing or vendor recertification of the pump every 18 months.

Expected Completion Date: August 31, 2011

STPNOC 60-Day Response to Bulletin 2011-01

NRC Request 3

Describe in detail the controls for assuring that the equipment is available when needed.

Examples of the types of information to include when providing your response to Question (3) are:

a. *A description of any inventory requirements established for the equipment.*

b. *A listing of deficiencies noted in inventories for the equipment and corrective actions taken to prevent loss.*

These examples are not meant to limit your response if you use other methods to address the issues described above.

STPNOC Response (3)

In addition to the controls described in Responses 1 and 2, procured non-permanently installed B.5.b equipment is inventoried quarterly in accordance with station processes or procedures. This inventory assures the items are stored in the proper quantities and location, equipment shelf lives (foam, batteries, etc.), equipment is accessible, and storage locations are controlled. (See Table below.)

Inventory procedures require deficiencies to be recorded and resolved. If any discrepancy cannot be corrected at the time of the inventory, then they are entered into the Corrective Action Program (CAP). As of the date of this response, there are no outstanding inventory deficiencies that would render the strategies not viable.

Emergency Locker Inventory

Equipment	**Inventory Frequency**	**Special Storage Controls**	**Items Verified (e.g. proper quantities, locations, pressures, calibrations, shelf life, equipment is accessible.)**
Fire Hoses	Quarterly	Inside Buildings (dry conditions)	Item quantity verified and accessible
Various lengths of rope	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible

STPNOC 60-Day Response to Bulletin 2011-01

Equipment	**Inventory Frequency**	**Special Storage Controls**	**Items Verified (e.g. proper quantities, locations, pressures, calibrations, shelf life, equipment is accessible.)**
Copies of applicable procedures: Includes Emergency Operating Procedures (EOP's) Mitigation Strategies (0POP10's) Off Normal Procedures (0POP04's)	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Gated wyes at each of the installed fire monitor's	Quarterly	Staged in climate controlled buildings	Item quantity verified, inspected to ensure in good condition, in correct position, and accessible
Flashlights, Battle Lanterns, Portable Lanterns	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition, accessible, and verified functional batteries
Keys	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Wrenches and tools	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Reducers and couplings	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Flange and Gaskets	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Breaker tools	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible

STPNOC 60-Day Response to Bulletin 2011-01

Equipment	**Inventory Frequency**	**Special Storage Controls**	**Items Verified (e.g. proper quantities, locations, pressures, calibrations, shelf life, equipment is accessible.)**
Differential pressure gauges with braided hoses Pressure gauge with braided hose	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
SG PORV Manual Hydraulic Pump with hoses, fittings and wrench	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Electronic flow gauges with instructions	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible No calibration required
Air jumper hoses with fittings and hose connectors	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Bag of wood blocks for valve blocking devices	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Safety Harnesses	Quarterly	Locked closed Emergency Lockers	Item quantity verified, inspected to ensure in good condition and accessible
Trailer mounted firefighting monitor	Weekly	Inside building (dry storage)	Item quantity verified, inspected to ensure in good condition and accessible
Required fire hose lengths on trailer	Weekly	Inside building (dry storage)	Item quantity verified, inspected to ensure in good condition and accessible
Foam educting drum kit on trailer	Weekly	Inside building (dry storage)	Item quantity verified, inspected to ensure in good condition and accessible
(19) 55-gallon barrels of Aqueous Film Forming Foam (AFFF)	Weekly	Inside building (dry storage)	Item quantity verified, inspected to ensure in good condition and accessible

STPNOC 60-Day Response to Bulletin 2011-01

B.5.b Diesel Driven Fire Pump Inventory

Equipment	**Inventory Frequency**	**Special Storage Controls**	**Items Verified (e.g. proper quantities, locations, pressures, calibrations, shelf life, equipment is accessible.)**
B.5.b Diesel Driven Portable Pump, including Pintle Hitch	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Trailer with B.5.b Diesel Driven Portable Pump suction hoses	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Fire hoses	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Flange connections and flange with reducer	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Rope, wrenches, and gaskets	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Pump key not inserted in switch Pump Battery trickle charger connected and ON.	Quarterly	Located in an enclosed metal building	Verified to assure battery not drained and remains charged.
Pump Fuel Oil tank full	Quarterly	Located in an enclosed metal building	Verify fuel quantity
Gated Wyes Double female fittings Double male fittings	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible
Current revision of procedures for Spent Fuel Pool Damage Mitigation Strategies and Alternate Fire Protection System Operation	Quarterly	Located in an enclosed metal building	Item quantity verified and accessible

STPNOC 60-Day Response to Bulletin 2011-01

SFP Damage Control Kit Inventory

Equipment	**Inventory Frequency**	**Special Storage Controls**	**Items Verified (e.g. proper quantities, locations, pressures, calibrations, shelf life, equipment is accessible.)**
Damage Control Kits (1 in each Unit)	Quarterly	Locked in equipment cages	Item quantity verified and accessible

STPNOC 60-Day Response to Bulletin 2011-01

NRC Request 4

Describe in detail how configuration and guidance management is assured so that strategies remain feasible.

Examples of the types of information to include when providing your response to Question (4) are:

a. *Measures taken to evaluate any plant configuration changes for their effect on feasibility of the mitigating strategies.*

b. *Measures taken to validate that the procedures or guidelines developed to support the strategies can be executed. These measures could include drills, exercises, or walk through of the procedures by personnel that would be expected to accomplish the strategies.*

c. *Measures taken to ensure procedures remain up-to-date and consistent with the current configuration of the plant.*

d. *A description of the training program implemented in support of the mitigating strategies and the manner in which you evaluate its effectiveness.*

These examples are not meant to limit your response if you use other methods to address the issues described above.

STPNOC Response (4)

Plant configuration changes are procedurally evaluated against the licensing basis, including the license conditions and their associated safety evaluation.

Initially, mitigating strategies were validated by walkdowns and engineering evaluations. Subsequent procedure changes are validated to ensure that the guideline remains viable. In 2011, B.5.b mitigating strategies were revalidated by walkdowns. The training discussed below also validates that the associated mitigating strategies can be deployed.

The design change process requires a review for potential impacts on B.5.b mitigating strategies, including affects on procedures and any other necessary changes. The design change procedure directs the user to seek clarification from knowledgeable individuals familiar with B.5.b commitments and complete a special review form since the information may be sensitive and not readily available.

The mitigating strategy guidelines are controlled consistent with procedural controls under established administrative processes. All strategies developed at STP are contained within an approved procedure or guideline. Per the Westinghouse Owners Group – Emergency Response Guidelines, as well as specific procedure processes, new strategies or changes to existing strategies contained within procedures are required to be validated. Subsequently, when new procedures or strategies contained within existing procedures are developed that

STPNOC 60-Day Response to Bulletin 2011-01

may contain Operator Time Critical Actions the procedures are validated on the actual plant, if possible. However, if it is not possible to actually perform a validation of a procedure due to regulatory or plant condition without an increase in risk, then a simulation, walk down, or mock up is performed using the procedure, prior to procedure approval.

In addition, training is provided to operating crews, during which, any further deficiencies may be noted and corrected.

The following table describes the training program implemented in support of the mitigating strategies and the manner in which effectiveness is evaluated.

Station Personnel	Training	Periodicity	Evaluation
Operations[1]	Initial training and continuing training as described below	Licensed Operator continuing training – 2 years Non-licensed – 4 years	Written exams, Qualification process, plant walkthroughs and simulator exercises
Fire Brigade	Large accelerant fed fires - classroom fundamentals and techniques, live fire training practice and evaluation	Live fire training – annual Classroom training - biennial	Written exams, drills
Emergency Response Organization (ERO) Key Decision Makers & Implementers[1, 2]	Initial and continuing Severe Accident Management Guidelines (SAMGs) training (SMG-002/ 202)	3 years	Computer based training with read & sign acknowledgement
Emergency Response Organization Evaluators[2]	Initial and continuing SAMGs training (SMG-002/202)	3 years	Computer based training with read & sign acknowledgement
Emergency Response Organization [2]	Initial and continuing training 0POP10 Emergency Accident Mitigation Training (EPT-512)	3 years	Computer based training with read & sign acknowledgement

STPNOC 60-Day Response to Bulletin 2011-01

Station Personnel	Training	Periodicity	Evaluation
Emergency Response Organization	Security/Emergency Response Integrated exercises	6 Years	Currently required to be performed every 6 years. A pilot drill was conducted May 19, 2009; however the exercise was observed but not evaluated by the NRC. Future exercises will be evaluated.
Engineering	One time computer based training for engineering personnel task qualified to perform design changes. This training, in part, ensured students were knowledgeable of the procedural requirements that require additional review for design changes that may impact the station's ability to respond to B.5.b-related events by affecting mitigation strategies (ESP410018)	One-time	Written exam
Engineering	Initial Qualification for engineering personnel responsible for design changes	Initial (prior to completing a design change package)	Evaluated against standards for Qualification as part of the mentoring process based on satisfactory completion of a design change package using the current revision of the design change checklist.

STPNOC 60-Day Response to Bulletin 2011-01

Station Personnel	Training	Periodicity	Evaluation
Security	Initial and continuing training on Security Instruction SI 2700, Security Response to Airborne Threats	Annual	Security personnel receive classroom training related to actions the security force would take in the event of an airborne threat. The procedure is read and discussed.
General Site Population	General Employee Training on response to an airborne threat	Annual	Site specific training material on individual response to aircraft threat is included in a computer based training module; however, there are currently no test questions on the material.

Notes:

[1] Operations

Plant Operators receive initial training related to local actions required in the event of extensive damage mitigation and other procedures in the POP10 series (B.5.b & Beyond Design Basis Mitigation Strategies). This is performed through walkthrough with qualified operators, and required prior to initial watch standing. Continuing training for Plant Operators is embedded in the Plant Operator Requalification (POR) Four-year Plan. This training includes plant walkthroughs and classroom discussion of the POP10 series. This continuing training is a required component of POR. All Plant Operators in watch standing positions are qualified to implement local actions of the POP10 procedure series.

Licensed Operators receive initial training related to all Emergency Operating Procedures (EOPs), all Off-normal Operating Procedures, Severe Accident Management Guidelines, Extensive Damage Mitigation Guidelines, and other procedures in the POP10 series. This training consists of a combination of classroom discussion and simulator practice. Continuing training for licensed operators is embedded in the Licensed Operator Requalification (LOR) Two-year Plan and Emergency Planning continuing training. The LOR Two-year Plan contains tasks and objectives for continual training of security-related Off-normal procedures, EOPs related to station blackout, and the entire POP10 series. Emergency Planning ensures continuing training of Severe Accident Management Guideline training. Procedure 0PGP03-ZT-0132, Licensed Operator Requalification, requires removal from watch standing duties if required training is not completed in a timely manner. All active licensed operators in Control

STPNOC 60-Day Response to Bulletin 2011-01

Room watch standing positions are qualified to implement Emergency Operating Procedures, Off-normal Procedures, Severe Accident Management Guidelines, Extensive Damage Mitigation Guidelines, and other procedures in the POP10 series.

[2] Selected ERO candidates only

STPNOC 60-Day Response to Bulletin 2011-01

NRC Request 5

Describe in detail how you assure availability of off-site support.

Examples of the types of information to include when providing your response to Question (5) are:

a. *A listing of off-site organizations you rely on for emergency response.*

b. *Measures taken to ensure the continuity of memoranda of agreement or understanding or other applicable contractual arrangements. This should include a listing of periods of lapsed contractual arrangements.*

c. *A listing of any training or site familiarization provided to off-site responders. This should include any measures taken to ensure continued familiarity of personnel of the off-site responders in light of turnover and the passage of time.*

These examples are not meant to limit your response if you use other methods to address the issues described above.

STPNOC Response (5)

The agreements and procedures identified in the table below were re-confirmed in 2011 and are reviewed annually and renewed as necessary.

Currently there are no lapsed agreements with offsite support organizations.

STPNOC has not identified issues involving lapsed Letters of Agreement related to the B.5.b. program requirements from 2008 to present.

Training requirements for offsite support organizations are described in site procedures.

Off-site Organization	**Implementing Document**	**Validation and Periodicity**	**Training/Familiarization Refresher /Periodicity**
Bay City Volunteer Fire Department (BCVFD)	Letter of Agreement	12/20/2010 Reviewed Annually	Offered Annually In conjunction with annual site familiarization training the BCVFD is invited to participate in a combination drill with the STP site fire brigade.
Bay City Police Department	Letter of Agreement	1/12/2011 Reviewed Annually	Offered Annually

STPNOC 60-Day Response to Bulletin 2011-01

Off-site Organization	Implementing Document	Validation and Periodicity	Training/Familiarization Refresher /Periodicity
Matagorda County	Letter of Agreement	11/15/2010 Reviewed Annually	Offered Annually
Matagorda County Officials Bay City Volunteer Fire Department Bay City Mayor Matagorda County Sherriff	Matagorda County All Hazards Annexes Annex F Firefighting Appendix 2 STP Coordinated Firefighting Strategy	11/21/2008 Reviewed every 5 years	Not Applicable
Matagorda County EMS	Letter of Agreement	12/02/2010 Reviewed Annually	Offered Annually
Matagorda County Hospital District	Letter of Agreement	11/17/2010 Reviewed Annually	Offered Annually
Matagorda County Sheriff's Office	Letter of Agreement	11/15/2010 Reviewed Annually	Offered Annually
Palacios Police Department	Letter of Agreement	11/15/2010 Reviewed Annually	Offered Annually
Palacios Volunteer Fire Department (PVFD)	Letter of Agreement	4/25/2011 Reviewed Annually	Offered Annually In conjunction with annual site familiarization training the PVFD is invited to participate in a combination drill with the STP site fire brigade.
United States Coast Guard, Corpus Christi	Letter of Agreement	3/28/2011 Reviewed Annually	Not Applicable

STPNOC 60-Day Response to Bulletin 2011-01

Off-site Organization	**Implementing Document**	**Validation and Periodicity**	**Training/Familiarization Refresher /Periodicity**
Boots & Coots International Well Control Wild Well Control ChemGuard (Large Fire Support)	Large Fire support identified in site emergency response implementing procedure 0ERP01-ZV-EF07 (Support Organization Director Checklist) and contact numbers are maintained in Emergency Communications Directory	04/12/11 Phone numbers in the Emergency Communications Directory verified Quarterly	Not Applicable